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1 received or not received in the nursing department;
2 is that right?
3 A. Yes.
4 Q. Do you do any training in your
5 department?
6 A. No.
7 Q. Who would, if anybody?
8 A. We have a human resources department that
9 provides us training for such things as HIPAA.
10 Q. Okay. I, in discovery, did receive --
11 I'm not going to have it admitted, but it's called
12 the amended and restated January 2016 Calumet Region
13 Fund Plan, okay? And then I also received through
14 discovery earlier a Summary of Plan, which was dated
15 2010.
16 Do you know what amendments, if any,
17 have occurred between 2010 and 2016?
18 A. Not offhand. But if there were, then we
19 would be able to provide you with amendments on the
20 Calumet side.
21 Q. Okay.
22 A. I'm not familiar with any --
23 Q. Okay.
24 A. -- amendments since 2010.
25 Q. Okay.

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1 A. There could be some. I'm sure there are.
2 Q. The document that you supplied today is
3 dated in 2007.
4 Were there amendments -- well, I
5 guess you wouldn't know. You weren't there.
6 A. Amendments occur on a normal basis. So
7 if there is an amendment, we would be able to provide
8 it.
9 Q. Okay.
10 MR. TORRES: Just for the record, what
11 document are you referring to when you say "the one
12 submitted today"?
13 MR. O'HARA: I'm referring to the one that
14 looks like the health benefits plan document
15 effective January 1st, 2007.
16 MS. STEWART JOHNSON: Cal Fund 663.
17 MR. O'HARA: I assume this is the plan right
18 here?
19 MS. STEWART JOHNSON: Yes.
20 MR. O'HARA: Let's go off the record for a
21 minute.
22 (WHEREUPON, a discussion
23 was had off the record.)
24 MR. O'HARA: Back on the record.
25 I'll pass the witness.

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1 EXAMINATION
2 BY MS. STEWART JOHNSON:
3 Q. Mr. Niksa, my name is Amy Johnson, and I
4 represent the City of Hammond and Professional Claims
5 Management, Inc., in this lawsuit. I just have a
6 couple of questions for you.
7 The appeal transmittal cover sheet
8 that was marked as Exhibit 2, do you know the date of
9 that?
10 A. I believe on the second page it says
11 September 2014. That's what I'm seeing here. It's
12 probably the date assigned.
13 Q. Okay. So we know it was sometime in
14 September of 2014?
15 A. Yes.
16 Q. Well, let's see --
17 A. Actually, it would have been
18 September 12th because we have the minutes of that
19 meeting.
20 Q. Because the meeting was September 12?
21 A. Yes.
22 Q. Got you.
23 Do you know -- well, I have a
24 question about the relationship between the
25 Calumet Fund and Blue Cross Blue Shield.

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1 Is -- does Cal Fund sort of act
2 like a TPA -- like a third-party administrator
3 between Blue Cross Blue Shield and the employees?
4 A. No. We're their administrator. The fund
5 office is the administrator of that Calumet Plan.
6 And we have a contract with Blue Cross Blue Shield
7 for discounts. So providers that are in Blue Cross
8 Blue Shield go in the system and get paid by Blue
9 Cross Blue Shield, and we benefit by getting the
10 discounts for the memberships.
11 Q. So do you know whether Anchor Health
12 Systems was an in-network provider with Blue Cross
13 Blue Shield during 2013, '14?
14 A. Not personally, but I believe they were a
15 provider.
16 Q. And is -- do you assume that because of
17 the --
18 A. The breakdown that we just saw.
19 Q. Yes. Yes. That shows the discount?
20 A. Yes.
21 Q. That would be Cal Fund 659?
22 A. Yes.
23 Q. This sheet?
24 A. Yes.
25 Q. You testified that Tom Pasco is the one